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June 17, 2011

Received & Inspected

JUN 23 2011

FCC Mail Room

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC. 20554

Re: WT Docket No. 11-79
Spectrum Needs for Positive Train Control

Dear Ms. Dortch:

Northeast Illinois Regional Commuter Railroad Corporation/dba Metra, is a governmental entity, supported by federal and state public funding, providing commuter railroad service in Northeastern Illinois. Metra appreciates the opportunity to respond to the recent Public Notice issued in the above-referenced Docket and is supportive of the FCC's efforts to implement a national positive train control (PTC) program. Metra joins with the American Public Transportation Association (APTA), of which Metra is a member, to urge the commission to grant Metra the assignment of the 220 MHz spectrum necessary for the provision of PTC. Additionally, Metra requests, as a publicly funded agency, that the FCC waive or otherwise exempt Metra from the costs associated with the purchase of the spectrum necessary to implement PTC. The overall cost for implementation of PTC is staggering, and as a provider of public service, Metra is not in an economic position to fund the acquisition of PTC spectrum, nor wishes to pass this expense on to the tax payers.

Additionally, Metra also urges the Commission to take prompt action to make more spectrum available and usable for the provision of PTC. While the Rail Safety Improvement Act of 2008 mandated the implementation of interoperable PTC – which is by definition a wireless technology – it made no provision for the allocation of spectrum for such purpose, thus leaving the railroad industry to find its own spectrum solution. To facilitate interoperability, the industry has coalesced around the 220MHz band, which shares similar propagation characteristics with the 160 MHz bank that is already widely in use for railroad voice communications systems, thus enabling infrastructure sharing. However, as the Wireless Telecommunications Bureau correctly recognized most railroads including Metra are concerned that adequate quantities of spectrum in the 220 MHz spectrum as a “major challenge” to PTC implementation, with another 31% citing it as a “minor challenge.”

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Metra supports the comments being filed in the docket by PTC-220, LLC. Metra urges the Commission to evaluate its current inventory of unused spectrum in the 217 – 222 MHz range to determine what can be made available expeditiously for PTC use, particularly in metropolitan areas where railroad traffic is densest and the associated PTC demands will be the highest. For spectrum in this range that is already licensed, the Commission should promptly process applications for assignment of licenses to railroads planning to use the spectrum for PTC.

Finally, in order to be usable for PTC, waivers of the service rules associated with this spectrum will be needed. To provide the clarity needed for planning PTC deployments, the Commission should announce in advance the rules it will ordinarily be prepared to waive for railroads seeking to use the spectrum for PTC purposes, and any prerequisites for obtaining such waivers. It should also commit to processing waiver applications quickly once filed, especially if the applicant is not seeking rule changes outside of the "pre-approved" waiver parameters.

Metra appreciates the Bureau's interest in and efforts on this matter. It is unlikely that PTC can be properly implemented in all areas of the country consistent with Congress' directive without assistance from the Commission described above.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alex Clifford", with a long, sweeping horizontal line extending to the right.

Alexander D. Clifford
Executive Director/CEO

ADC/BMM/dmm0009